JUDGE PRESKA

08 CV 02361

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Attorneys for Plaintiff,
James N. Hood as Liquidating Trustee of the
Oceantrade Corporation Liquidating Trust

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JAMES N. HOOD AS LIQUIDATING TRUSTEE OF THE OCEANTRADE CORPORATION LIQUIDATING TRUST,

Plaintiff,

-against-

SINOTRANS (GERMANY) GMBH,

Defendant.

08 Civ. ( )

AFFIDAVIT IN SUPPORT OF ATTACHMENT

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

James H. Hohenstein, being duly sworn, deposes and says:

1. I am a member of the firm of Holland & Knight LLP, attorneys for plaintiff James N. Hood as Liquidating Trustee of the Oceantrade Corporation Liquidating Trust, and I am duly admitted to practice before the United States District Court for the Southern District of New York.

2. I am familiar with the facts and circumstances underlying this dispute and I am submitting this affidavit in support of the Verified Complaint and the Writ of Attachment.

3. Defendant Sinotrans (Germany) GmbH ("Sinotrans") is not listed in the telephone directory of the principal metropolitan areas in this district, nor is it listed in the Transportation Tickler, a recognized commercial directory in the maritime industry.

4. Our office contacted the Secretary of State for the State of New York and was advised that Sinotrans is not New York business entity, nor is it a foreign business entity authorized to do business in New York.

5. To the best of my information and belief, defendant Sinotrans cannot be found within this district or within the State of New York.

6. Based upon the facts set forth in the Verified Complaint, I respectfully submit that the defendant Sinotrans is liable to Plaintiff for the damages alleged in the Verified Complaint, which amounts, as best as can be presently determined, to a total of $223,555.58.

7. Upon information and belief, defendant Sinotrans has property, goods, chattels or effects within this jurisdiction, to wit: funds or accounts held in the name of Sinotrans (Germany) GmbH at one or more of the following financial institutions:

ABN Amro Bank

American Express Bank

Banco Popular

Bank of America, N.A.

Bank of China

Bank Leumi USA

The Bank of New York

BNP Paribas

Calyon Investment Bank

Citibank, N.A.

Commerzbank

Deutsche Bank Trust Company Americas

HSBC Bank USA, N.A.

JPMorgan Chase Bank, N.A.

Northern Trust International Banking Corporation

Standard Chartered Bank

Société Générale

UBS AG

Wachovia Bank, N.A.

8. Plaintiff is, therefore, requesting that this Court, pursuant to Rule B(1) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, issue a writ of maritime attachment for an amount up to $223,555.58.

WHEREFORE, Plaintiff respectfully requests that the application for a writ of maritime attachment and garnishment be granted.

James H. Hohenstein

Sworn to before me this
5th day of March, 2008

Notary Public

DIALYZ E. MORALES
Notary Public, State Of New York
No. 01MO6059215
Qualified In New York County
Commission Expires June 25, 2011

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